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ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: July 5, 2000/ 10:30 a.m.

Site Contact(s): Ted A. Hopkins
Phone: 303-966-7652

Regulatory Contact: James Hindman
Phone: 303-692-3345

Agency: CDPHE

Purpose of Contact: Clarification regarding the applicability of the P.E. Certification to the B777/776 DOP.

Discussion

The RFETS Permit and the Interim Status Closure Plan require that RCRA Closure (including Clean Closure by Decontamination and Debris Treatment) be certified by "an independent registered engineer." A Professional Engineer (P.E.) certification is not required for closure by removal. The Building 777/776 DOP does not specify requirements for P.E. certification for closure.

I asked Mr. Hindman for clarification regarding the applicability of the P.E. Certification to the B777/776 DOP. I voiced my opinion that the P.E. Certification requirement was not applicable to the building DOP. Mr. Hindman asked for more information before rendering his opinion. He requested a description of the work planned on this RCRA Unit. I provided the following:

Room 430, Glovebox FL-1, Set 26

Planned activities include debris treatment to remove any residue followed by unit removal and offsite disposal.

After discussing the proposed work, Mr. Hindman suggested that the following interpretation would meet both the DOP and RFETS requirements. The Glovebox will go through LDR treatment under the debris rule. It is the generator's responsibility to ensure that the Glovebox meets the "clean surface debris standards" identified in 6 CCR 1007-3 Part 268.45. Once the debris treatment is complete, the unit will go through RCRA Closure. If the operator selects Unit Removal followed by offsite disposal as the Closure Option, an independent registered engineer's certification is not required.

Contact Record Prepared By: Ted A. Hopkins

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